

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

**Truth-in-Billing
and
Billing Format**

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CC Docket No. 98-170

**Supplement to March 21, 2000
Petition for Temporary, Limited Waiver**

The Petitioning Local Exchange Companies ("Petitioners") that filed a Petition for Temporary, Limited Waiver on March 21, 2000 in the above-captioned proceeding ("Petition"), by counsel, hereby file this Supplement to include three (3) additional companies in the Petition, Colorado Valley Telephone Cooperative, Inc., Dekalb Telephone Cooperative, Inc. dba DTC Communications, and Germantown Telephone Company (the "Companies").¹ Like the Petitioners, the Companies hereby seek temporary, limited waiver of the Truth-in-Billing ("TIB") requirements, set forth in 47 C.F.R. § 64.2400, established by the Federal Communications Commission ("Commission" or "FCC") in its First Report and Order and Further Notice of Proposed Rulemaking in the above-captioned matter.² As indicated in the attachments, the Companies seek temporary, limited waiver of various TIB rules that are effective April 1, 2000.

¹ Attachment A hereto are the declarations of each of the Companies joining this Supplement, along with a revised copy of "Attachment A" which adds the names of the Companies to the list of Petitioners originally included in the Petition. The declarations contain facsimile signatures. The original signed declarations will be filed with the Commission upon receipt by counsel.

² In the Matter of Truth-in-Billing and Billing Format, First Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 98-170, FCC 99-72, released May 11, 1999, 64 Fed. Reg. 34488 (June 25, 1999) ("TIB Order"); Errata, CC Docket No. 98-170, DA 99-2092, released October 6, 1999.

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The factual circumstances confronting each of the Companies is substantially similar to that confronting each of the Petitioners, as stated in the Petition. Moreover, the policy bases and remedial measures that each Company will take during the time that the requested waivers are in effect are the same. Accordingly, this Supplement is filed in order to add the Companies to the list of Petitioners, without unnecessarily burdening the record with pleadings that duplicate the Petition. In the event the Commission deems it necessary, however, the Companies will file separate waiver requests.

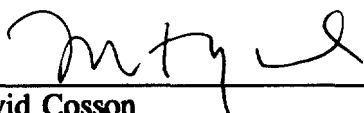
For the reasons stated in the Petition and the attachments, compliance with the April 1, 2000 effective date for certain of the TIB rules is technically and economically infeasible. Accordingly, the Companies, like the Petitioners, respectfully submit that a grant of this request for the time periods specified in the attachments will ensure that the Companies can implement the Commission's TIB directives in an efficient manner while avoiding unnecessary and wasteful expense. At the same time, and for the same reasons stated in the Petition, the consumer goals of these TIB rules will not be frustrated by a grant of this request in light of the conditions that each Company has agreed should be part of the relief.

Accordingly, in the event that action on the pending United States Telecom Association Petition does not grant the extent of the relief requested herein, the Companies request a waiver of the applicable TIB rules for the time periods specified in Attachment A.

Respectfully submitted,

Colorado Valley Telephone Cooperative, Inc.
DeKalb Telephone Cooperative, Inc.
dba DTC Communications
Germantown Telephone Company

By



David Cosson
Thomas J. Moorman
Margaret Nyland

Kraskin, Lesse & Cosson, LLP
2120 L Street, NW, Suite 520
Washington, DC 20037
202-296-8890

Their Attorneys

March 22, 2000

Attachment A
List of Petitioning Local Exchange Companies

Armstrong Telephone Company - Maryland
Armstrong Telephone Company - New York
Armstrong Telephone Company - North
Armstrong Telephone Company - Northern Division
Armstrong Telephone Company - Pennsylvania
Armstrong Telephone Company - West Virginia
Colorado Valley Telephone Cooperative, Inc.
Deerfield Farmers' Telephone Company
DeKalb Telephone Cooperative, Inc. dba DTC Communications
Germantown Telephone Company
North Pittsburgh Telephone Company
Poka Lambro Telephone Cooperative, Inc.
Poka Lambro Telecommunications, Inc.
 dba Poka Lambro Telephone Company
Valley Telephone Cooperative, Inc.
Copper Valley Telephone, Inc.

COLORADO VALLEY TELEPHONE COOPERATIVE, INC.

Colorado Valley Telephone Cooperative, Inc. ("Petitioner") provides exchange and exchange access services to approximately 6,915 access lines in Texas. As a telephone cooperative, Petitioner provides billing and collection services to its members/owners. The Petitioner is a member of the United States Telecom Association and is a rural telephone company under the Communications Act of 1934, as amended. The Petitioner provides billing and collection services for third party providers including such services for certain interexchange carriers' 1+ traffic and for providers of casual calling and alternate operator services. The Petitioner utilizes APTIS for the provision of end user billing software. Petitioner has made frequent periodic contacts with its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements and has made reasonable and good-faith efforts to ensure that APTIS would be taking all necessary steps to ensure that the software upgrades and modifications to its end user billing system would be made in sufficient time to allow proper testing. Despite these efforts, it was not until March 9, 2000 that APTIS indicated that it would not be able to meet the April 1, 2000 date, and it was not until March 16, 2000 that APTIS provided the necessary information that enabled Petitioner to assess what TIB compliance issues remained. Despite the Petitioner's reasonable, good-faith efforts, the delays in providing the necessary software upgrades and, in turn, the inability to conduct the proper testing were beyond Petitioner's control.

Based on the information that APTIS has provided to date, Petitioner requests the following waivers for the time periods noted.

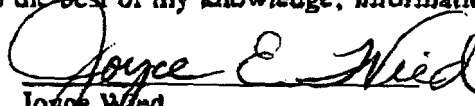
<u>TIB Rule Requirement</u>	<u>Rule Provision(s)</u>	<u>Requested Extension</u>
TIB New Service Provider Requirement	47.C.F.R. §64.2401(a)(2)	July 1, 2000
TIB Deniable/Nondeniable Requirement	47.C.F.R. §64.2401(c)	July 1, 2000
TIB Service Provider Name and Inquiry Contact Requirement	47.C.F.R. §64.2401(a)(1)-(2) and 47 C.F.R. §64.2401(d)	July 1, 2000

Until the requested waiver expires, the Petitioner will provide the appropriate bill message and/or insert and the customer service responses identified in the Petition.

DECLARATION OF JOYCE WIED

I, Joyce Wied, General Manager of Colorado Valley Telephone Cooperative, Inc. ("Petitioner"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein and on this attachment regarding Petitioner is true and accurate to the best of my knowledge, information, and belief.

Date March 22, 2000


Joyce Wied
General Manager

**Colorado Valley Telephone Cooperative, Inc.
Chronology of Discussions of Truth in Billing with Aptis**

1. Email sent to Aptis employees Tracey London and Laura Nastasia dated July 14, 1999 briefly describing the requirements of TIB and requesting a response from Aptis.
2. Went over TIB requirements with Aptis employee Tracey London on August 5, 1999 while she was on-site assisting with our first billing.
3. Addressed TIB requirements, along with other issues, with several Aptis employees, including Karen Mitchell and Bob Warren, at the Aptis Users Group Meeting on August 12, 1999.
4. Requested update on TIB from Aptis employee Tracey London in an email dated September 16, 1999. Response from Aptis was that they were checking with Development on it. Later response indicated that Aptis was waiting for input from us as to the requirements. We again discussed our interpretation of the rules and suggested they combine that with input from their other customers to develop a solution.
5. In a letter written to Kelly Simmons, President of Billing Concepts (parent company of Aptis), dated October 6, 1999, included the need for assistance with the TIB requirements.
6. Held meeting at Colorado Valley with Billing Concepts employees Karen Mitchell and Sheila Joiner on December 7, 1999 to address issues including TIB.
7. On March 3, 2000, sent an email to Aptis employee Bob Kolar asking for the status of the TIB solution and reminding him of the April 1 deadline.
8. Received a letter from Aptis employee Bob Kolar dated March 9, 2000 stating that Aptis would not be able to deliver a solution by April 1, 2000.
9. In a phone conversation with Aptis employees Bob Kolar and Sean Conner on March 16, 2000, Bob stated that Aptis would need 90 days to have a solution in place.

DEKALB TELEPHONE COOPERATIVE, INC. DBA DTC COMMUNICATIONS

Dekalb Telephone Cooperative, Inc. dba DTC Communications ("Petitioner") provides exchange and exchange access services to approximately 20,043 access lines in Tennessee. As a telephone cooperative, Petitioner provides end user billing services to its members/owners. The Petitioner is a member of the United States Telecom Association and is a rural telephone company under the Communications Act of 1934, as amended. The Petitioner provides billing and collection services for third party providers including such services for certain interexchange carriers' 1+ traffic and for providers of casual calling and alternate operator services. The Petitioner utilizes Global Programming Services ("Global") for the provision of end user billing software. Petitioner has made frequent periodic contacts with its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements and has made reasonable and good-faith efforts to ensure that Global would be taking all necessary steps to ensure that the software upgrades and modifications to its end user billing system would be made in sufficient time to allow proper testing. Despite these efforts, it was not until March 17, 2000 that Global indicated that it would not be able to meet the April 1, 2000 date, and provided the necessary information that enabled Petitioner to assess what TIB compliance issues remained. Despite the Petitioner's reasonable, good-faith efforts, the delays in providing the necessary software upgrades and, in turn, the inability to conduct the proper testing were beyond Petitioner's control.

Based on the information that Global has provided to date, Petitioner requests the following waivers for the time periods noted.


<u>TIB Rule Requirement</u>	<u>Rule Provision(s)</u>	<u>Requested Extension</u>
TIB New Service Provider Requirement	47.C.F.R. §64.2401(a)(2)	July 1, 2000
TIB Deniable/Nondeniable Requirement	47.C.F.R. §64.2401(c)	July 1, 2000

Until the requested waiver expires, the Petitioner will provide the appropriate bill message and/or insert and the customer service responses identified in the Petition.

DECLARATION OF WAYNE GASSAWAY

I, Wayne Gassaway, Manager of Dekalb Telephone Cooperative, Inc. dba DTC Communications ("Petitioner"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein and on this attachment regarding Petitioner is true and accurate to the best of my knowledge, information, and belief.

Date 3.22.00


Wayne Gassaway
Manager

DEKALB TELEPHONE COOPERATIVE, INC. (d/b/a DTC Communications)**CHRONOLOGY OF TIB COMPLIANCE EFFORTS****March 22, 2000**

- May 1999 - DTC made first telephone contact with DPI/IBM, who was our software vendor at that time. Because they were involved in a major software project as well as Y2K issues, they advised that they would not begin TIB analysis until rules were finalized. In the meantime, DPI advised that they would no longer support TFS systems (the software program in place at DTC).
- Late September to early October 1999 - DTC initially talked with Global Programming Services about TIB requirements; however, due to Y2K work in progress at both DTC and Global, a formal request was not made.
- January 17, 2000 - DTC formally requested a quote from Global for TIB related programming.
- January 19, 2000 - DTC requested (via email - copy attached) clarification from Global on extent of changes.
- February 17, 2000 - Global provided written quote.
- March 6, 2000 - DTC's Assistant Data Processing Manager attended a Users Group Meeting at which time Global relayed information that TIB requirements for the state of Texas were more involved and had caused a delay in finalizing the software modification. However, Global did not indicate they would not be able to meet the April 1, 2000 deadline.
- March 9, 2000 - Global billed DTC for additional TIB analysis charges.
- March 13, 2000 (approximate date) - DTC contacted an alternate vendor about TIB programming but was unsuccessful in securing the necessary program changes.
- March 14, 2000 - DTC contacted Global for a firm delivery date and advised that DTC must receive modification, in time to load and test before March 25, 2000 for April billing.
- March 17, 2000 - Global provided written documentation that they would not be able to meet the billing deadline of March 25, 2000 for April 1, 2000 implementation. (See attached letter from Global.)
- March 21, 2000 - DTC has not yet received a firm quote from Global.



Morris Bowles

To: Phyllis McKinney/CSV/DEKALB@DEKALB

01/19/00 12:57 PM

cc:
Subject: Truth in billing.

----- Forwarded by Morris Bowles/DPS/DEKALB on 01/19/00 12:50 PM -----



Morris Bowles

To: glopro@ix.netcom.com

01/19/00 12:53 PM

cc:
Subject: Truth in billing.

Loretta, I have a copy of the FCC ruling 99-72. Starting with Appendix A - Final rules:

64.2401 (a). Bill organization - (1) no issue (2) (i) no issue (2) (ii) "New service provider" *any* provider (not just PICs) not appearing on *last months* bill will be identified as "new" and further notification provided if it is a local or IX PIC change.

(b). no issue (c) "deniable" (nonpayment may result in loss of local service) or "undeniable" charges ... may be indicated by a code and the explanation in a footnote or on the back of the bill (II .C.2.b. #44) note: there is no requirement to (sub)total these charges.

(d) no issue. This is our current understanding of the requirements - please advise if GPS plans to extend changes beyond the ruling.

Thanks, Morris.

Global Programming Services, Inc.

Richmond, Texas 77469

301 South Ninth Street, Suite 214

Phone: (281) 232-0450

Email: GLOPRO@ix.netcom.com

Fax: (281) 232-0833

March 17, 2000

DTC Communication
PO Box 247
Alexandria, TN. 37012-0247

Dear Mr. Bowles:

Global Programming will not be able to meet the March 25, 2000 deadline for your Truth in Billing requirements.

We will need a minimum of two to three weeks from the date we receive your approval of our estimated time/cost quote. Also, keep in mind that we are making certain assumptions about your billing system. We did not do the Y2K modifications for your billing system, therefore, the possibility exists that we will have additional time involved to retrofit any Truth in Billing modifications to your base billing system.

Sincerely,

Orv Anderson

GERMANTOWN TELEPHONE COMPANY

Germantown Telephone Company ("Petitioner") provides exchange and exchange access services to approximately 2,650 access lines in New York. The Petitioner is a member of the United States Telecom Association and is a rural telephone company under the Communications Act of 1934, as amended. The Petitioner provides billing and collection services for third party providers including such services for certain interexchange carriers' 1+ traffic and for providers of casual calling and alternate operator services. The Petitioner utilizes APTIS for the provision of end user billing software. Petitioner has made frequent periodic contacts with its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements and has made reasonable and good-faith efforts to ensure that APTIS would be taking all necessary steps to ensure that the software upgrades and modifications to its end user billing system would be made in sufficient time to allow proper testing. Despite these efforts, it was not until March 9, 2000 that APTIS indicated that it would not be able to meet the April 1, 2000 date, and provided the necessary information that enabled Petitioner to assess what TIB compliance issues remained. Despite the Petitioner's reasonable, good-faith efforts, the delays in providing the necessary software upgrades and, in turn, the inability to conduct the proper testing were beyond Petitioner's control.

Based on the information that APTIS has provided to date, Petitioner requests the following waivers for the time periods noted.

<u>TIB Rule Requirement</u>	<u>Rule Provision(s)</u>	<u>Requested Extension</u>
TIB New Service Provider Requirement	47.C.F.R. §64.2401(a)(2)	July 1, 2000
TIB Deniable/Nondeniable Requirement	47.C.F.R. §64.2401(c)	July 1, 2000
TIB Service Provider Name and Inquiry Contact Requirement	47.C.F.R. §64.2401(a)(1)-(2) and 47 C.F.R. §64.2401(d)	July 1, 2000

Until the requested waiver expires, the Petitioner will provide the appropriate bill message and/or insert and the customer service responses identified in the Petition.

DECLARATION OF BRUCE BOHNSACK

I, Bruce Bohnsack, President of Germantown Telephone Company ("Petitioner"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein and on this attachment regarding Petitioner is true and accurate to the best of my knowledge, information, and belief.

Date 3/22/00



Bruce Bohnsack
President



Germantown Telephone Company, Inc.
P.O. Box 188 210 Main Street Germantown NY 12526
toll free 877-537-6255 local 518-537-6255 fax 518-537-6700
web www.gtowntel.com

**GERMANTOWN TELEPHONE COMPANY, INC.
TIB COMPLIANCE DOCUMENTATION**

In addition to various telephone conversations between Germantown Telephone Company, Inc. personnel requesting status information regarding TIB from APTIS, the following chronology of documentation was sent to APTIS:

Oct. 14, 1999	Fax sent to APTIS concerning "Certain Truth-In-Billing Rules.....".
Oct. 21, 1999	Trouble Ticket sent to APTIS concerning the deadline for TIB and our concern for completion.
Nov. 17, 1999	A "Time and Cost Estimate" received from APTIS.
Nov. 18, 1999	Trouble Ticket sent to APTIS concerning modifications for the new TIB regulations.
January 4, 2000	Truth-In-Billing requirements. We had APTIS hold off on any programming until this date. Due to past experience with APTIS, Y2K was a major concern for us.
January 20, 2000	Follow-up fax to Jan. 4 th . This fax was sent to another programmer at APTIS.
Feb. 1, 2000	Fax sent to APTIS, originally received from Illuminet. Fax concerns Temporary Waivers and also information on Primary and Sub-Cic's.
Feb. 7, 2000	Fax sent to APTIS, concerning April 1, 2000 deadline.
Feb. 15, 2000	Email sent to APTIS asking how close we are to completion. Their response came three days later with no explanation.
Mar. 9, 2000	Copy of letter received from APTIS telling GTC to file for an extension.



GERMANTOWN TELEPHONE COMPANY
P.O. BOX 188
GERMANTOWN, NY 12526

FAX

To:**From:**

Tom Horn	Sherry Barringer	Date: 10/14/99 Number of Pages: 2 Phone: 518-537-6255 Fax: 518-537-6700 gtowntel@gtowntel.com
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Remarks:

Truth-in Billing -

I just received this fax -

There are just two of the issues that we need to discuss.

I know we need the 800 #, but I'm not sure just what we need on the third item.

Please call me today, if you can, and let me know where we stand. Thanks Tom.

Dave Johnson

KRASKIN, LESSE & COSSON, LLP
ATTORNEYS AT LAW
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

2120 L Street, N.W., Suite 520
Washington, D.C. 20037

Telephone (202) 296-8890
Telcopier (202) 296-8893

October 13, 1999

CERTAIN TRUTH-IN-BILLING RULES EFFECTIVE NOVEMBER 12, 1999

The following Truth-in-Billing rules are scheduled to go into effect November 12, 1999.

- OK • The name of the service provider associated with each charge must be clearly identified on the bill;
- OK • Where charges for two or more carriers appear on the same telephone bill, the charges must be separated by service provider;
- OK? • Charges must be accompanied by a brief, clear, non-misleading, plain language description of the service or services rendered. The description must be sufficiently clear and specific so that customers can accurately assess that the services for which they are billed correspond to the services that they have requested and received, and that the cost assessed for those services conform to their understanding of the price charged.
- ? • Telephone bills must contain clear and conspicuous disclosure of any information that the customer may need to make inquiries about, or contest charges, on the bill. Carriers must prominently display on each bill a toll-free number or numbers by which customers may inquire or dispute any charge contained on the bill. A carrier may list a toll-free number for a billing agent, clearinghouse, or other third party, provided that such party possesses sufficient information to answer questions concerning the customer's account and is fully authorized to resolve consumer complaints on the carrier's behalf. Each carrier must make its business address available upon request to consumers through its toll-free number.

Several client companies have already contacted us concerning their ability to comply with the FCC's TIB Rules. If you are concerned that your company may not be able to comply with these requirements by November 12th and wish to seek waiver and/or extension of time to meet the requirements, please contact us as soon as possible.

Finally, as we reported previously (General Telecommunications Report, Oct 1, 1999, Vol II-G, No. 56) the FCC has delayed, until April 1, 2000, the effective date for compliance with certain other Truth-in-Billing ("TIB") Rules - specifically, the requirement that telephone bills must provide clear and conspicuous notification of any change in service provider, including notification that a new provider has begun providing service (64.2001(a)(2)), and the requirement that carriers identify deniable and non-deniable charges (64.2001(c)). We will provide an update in the event these TIB requirements are modified.

Commsoft Program Request Form

Please complete this form and return it to Commsoft's Albany office for processing
7 Southwoods Blvd, Albany, NY 12211-2352 Fax to 518-431-7540

Customer Tracking Number: 19675

Company Name: Germantown Telephone Co.

Date: 10/21/99

Requested by: Sherry Barringer Department: _____

Type of Request (Please check one of the following):

- ☐ Error Message - Move cursor to error line, press help, and print help screens
- ☐ Correction of an error in an existing program
- ☒ Change an existing program
- ☐ Create a program
- ☐ Other (please describe) _____

Request Priority: 1 (1-5; 1 is high priority; 5 is low priority)

Requested Completion Date: 10/21/99

Nature of Problem or Request: (Attach additional pages as necessary.)

I've been in contact with Dave Johnson concerning Truth-In
billing; the deadline for the updates is 11/12/99. I
need a time frame as to when this job can be
Completed.

Customer Consent

This form must be signed by a representative of the company requesting program changes or new programs.
Work cannot begin on a request for a program change or new program until Commsoft has the written consent of
such a representative.

Authorized by: Sherry Barringer

Date: 10/21/99

Title: Office Manager

To be completed by Commsoft

Date Received: _____

Trouble Ticket #: _____

Assigned to: _____

Date: _____

☐ Customer Called

Name of Contact: _____

Date: _____



GERMANTOWN TELEPHONE COMPANY
P.O. BOX 188
GERMANTOWN, NY 12526

FAX

To:**From:**

Dave Johnson

Sherry Barringer

Date: 11/17/99

Number of Pages: 3

Phone: 518-537-6255

Fax: 518-537-6700

gtowntel@gtowntel.com

Remarks:

Truth-In Billing Requirements

Customer: Germantown
Contact: Sherry Barringer
Aptis Tracking ID:
Aptis Responsible Dept.: Classic Telephony
Date: 11/11/99

Truth in Billing Requirements

Business Requirements

Client has requested that modifications be done to comply with the new Truth in Billing legislation. The requirements at this point are vague, although we do have an understanding of some of the needs presented. We will address the most urgent needs of this legislation in this "Time and Cost Estimate". We will need to present a new T & C, when and if future requirements become defined and presented to us. The scope of the modifications in conjunction with this T & C will be outlined below.

Implementation

To implement this change, Aptis will make modify the bill print program and printer file to include the following.

- 1) List the "Name" of each service provider in conjunction with the charges they now provide.
- sb *2) List an 800# or other local number for inquiry purposes for each provider on the bill.
- 3) Present the billing statement with information regarding the type of service provided.
- 4) Separate all Toll records on the bill by designated Carrier ID or Identity.
- *5) Create and provide a new File to maintain and store information required for this purpose.
- *6) Provide an input screen to allow for maintenance and upkeep of related data.

It is our interpretation at this time that the above modifications should adequately address the new guidelines that the "Truth in Billing" has been presented to us for the time being. If you have other information, or feel that this will not adequately fulfill your needs, please contact us immediately, and we will discuss your particular needs and adjust our estimates to address your concerns. It is noted that in the future other requirements may be necessary, and that additional work may be required. We will be happy to discuss any new information or regulations that arise, and address them when the new guidelines are finalized.

Cost

Item	Estimated Hours	Cost per Hour	Total
Analysis & Design			
Database Changes and Coding			
Testing/Debugging/Review - Development			
Quality Assurance Testing			
Documentation			
Total for Project			

Total estimated cost for this project is \$ *This is an estimate only.* All charges will be based on a time and materials basis. Actual charges for implementing this functionality may be less than or may exceed this estimate. If you accept the functionality outlined in this document as a solution to your requirement (as indicated by returning a signed copy of this document as described under the sections below), your company will be billed monthly for the actual hours incurred at our current published hourly rates.

**** Please note, this estimate is based on a Level 4 programmer doing the work. If in fact a Level 2 or 3 programmer does the work your hourly charge will be lower, however the number of hours involved may be higher. ****

Implementation Timeframe and Customer Signoff

Due to the late release of this information it will be difficult to establish a schedule for this implementation. We will attempt to create the modifications as quickly as reasonably possible, however due to the upcoming holiday schedule and other Y2K concerns it may be necessary to request a variance. Please be patient with us during this time, as it will require us to handle these modifications in a relatively short period of time. We ask that you please review and return this document as described under "Authorization" by 11/17/99. Please note that if the document is not received by 11/17/99, we cannot guarantee that it will be included before the end of this year due to Y2K scheduling.

Please Note: If your Account Manager does not receive any correspondence from you regarding this issue by 11/30/99, Aptis will consider that as an indication that this requirement has been withdrawn by your company.

Authorization

Please review the changes/additions outlined above for the "Truth In Billing" process. If you have any questions regarding this document, please contact David Johnson at (518) 431-7500 or Spoke to on 11/17/99 djohnson@commsoft.net. This document may be marked up with changes and returned by FAX. Our FAX number is (518) 427-1642.

The implementation of the "Truth in Billing" process will not begin until we have received a signed copy of this document from you indicating your acceptance. Requests to modify this functionality after receipt of this signed document will be considered separate chargeable items.

Signature _____

Date _____

Name _____

Title _____

Issue Type: Modification	Issue Number	TT Num	Date Received	Project/ Module	Called In By	Date Completed	Submitted By	Due In	Current Status
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20484

11/18/99 Telephony

Sherry Barringer

Lambert, Lori

Assigned

* Request: Need to do modifications to the bill print to comply with the new "Truth in Billing" regulations. They would like us to create a file to hold the carriers information, including carrier #, phone number, and description fields for messages on the bill. We should set up our logic to cahn by carrier and then check for customers clas fo service field to retrieve the proper message. Please schedule this asap so we can meet our December biling run.

Action:

***** Modification

Number of Issues: 2



GERMANTOWN TELEPHONE COMPANY
P.O. BOX 188
GERMANTOWN, NY 12526

FAX

To:**From:**

Nadeem/Aptiv
Nadeem Jafri

Sherry Barringer

Date: 1/4/00**Number of Pages:** 3**Phone:** 518-537-6255**Fax:** 518-537-6700**glowntel@gtowntel.com****Remarks:**

Truth in billing requirements, etc.



Germantown Telephone Company, Inc.
P.O. Box 188 210 Main Street Germantown NY 12526
toll free 877-537-6255 local 518-537-6255 fax 518-537-6700
web www.gtowntel.com

TO: Nadeen/Aptis
FROM: Germantown Telephone Company
Sherry Barringer
SUBJECT: Truth-In Billing Requirements
DATE: January 4, 2000

This is to let you know that you can begin the testing on the Truth-In Billing which had been put on hold until after the first of the year. Let me know what it is that I will need to do and when I can begin. I would appreciate it if you would please call me when you receive this fax.

Also, listed below is the most current updated list of the Truth-In Billing Requirements that we have received from our attorneys. These requirements must be completed no later than April 1, 2000. Please let me know where we stand with all of these requirements.

BILL ORGANIZATION

- The name of service provider associated with each charge must be clearly identified on the bill;
- Where charges for two or more carriers appear on the same telephone bill, the charges must be separated by service provider; and
- The telephone bill must provide clear and conspicuous notification of any change in service provider, including notification to the customer that a new provider has begun providing service.

DESCRIPTIONS OF BILLED CHARGES

- Charges must be accompanied by a brief, plain language description of the service or services rendered. The description must be sufficiently clear and specific so that customers can accurately assess that the services for which they are billed correspond to those that they have requested and received, and that the assessed for those services conform to their understanding of the price charged. Vertical features such as Caller ID, Call Waiting, etc. (any calling feature, phone lease) must be broken down on the bill so that the customer can see what they are being billed for. (We do not do this now. These charges are bundled together on our bills.)

DENIABLE AND NON-DENIABLE CHARGES

- Where a bill contains charges for basic local service, in addition to other charges, the bill must distinguish between charges for which non-payment will result in disconnection of basic local service, and charges for which non-payment will not result in such disconnection. The carrier must explain this distinction to the customer, and must clearly and conspicuously identify on the bill those charges for which non-payment will not result in disconnection of basic local service. Carriers may also elect to devise other methods of informing consumers on the bill that they may contest charges prior to payment.

CLEAR AND CONSPICUOUS DISCLOSURE OF INQUIRY CONTACTS

- Telephone bills must contain clear and conspicuous disclosure of any information that the customer may need to make inquiries about, or contest charges, on the bill. Carriers must prominently display on each bill a toll-free number or numbers by which customers may inquire or dispute any charge contained on the bill. A carrier may list a toll-free number for a billing agent, clearinghouse, or other third party, provided that such party possesses sufficient information to answer questions concerning the customer's account and is fully authorized to resolve consumer complaints on the carrier's behalf. Each carrier must make its business address available upon request to consumers through its toll-free number.

A lot of these requirements have been completed. There are however, major changes that will need to be completed. Please let me know when programming will begin as I have to inform our attorneys because of the waiver that we've been granted.



GERMANTOWN TELEPHONE COMPANY
P.O. BOX 188
GERMANTOWN, NY 12526

FAX

To:

From:

Dave Johnson
Apt's
427-1642

Sherry Barringer

Date: 1/20/00

Number of Pages: 3

Phone: 518-537-6255

Fax: 518-537-6700

gtowntel@gtowntel.com

Remarks:

Truth-in Billing Requirements



Germantown Telephone Company, Inc.
P.O. Box 188 210 Main Street Germantown NY 12526
toll free 877-537-6255 local 518-537-6255 fax 518-537-6700
web www.gtowntel.com

TO: Dave Johnson

FROM: Germantown Telephone Company
Sherry Barringer

SUBJECT: Truth-In Billing Requirements

DATE: January 20, 2000

Listed below is the most current updated list of the Truth-In Billing Requirements that we have received from our attorneys. These requirements must be completed no later than April 1, 2000. Please let me know where we stand with all of these requirements.

BILL ORGANIZATION

- The name of service provider associated with each charge must be clearly identified on the bill;
- Where charges for two or more carriers appear on the same telephone bill, the charges must be separated by service provider; and
- The telephone bill must provide clear and conspicuous notification of any change in service provider, including notification to the customer that a new provider has begun providing service.

DESCRIPTIONS OF BILLED CHARGES

- Charges must be accompanied by a brief, plain language description of the service or services rendered. The description must be sufficiently clear and specific so that customers can accurately assess that the services for which they are billed correspond to those that they have requested and received, and that the assessed for those services conform to their understanding of the price charged. Vertical features such as Caller ID, Call Waiting, etc. (any calling feature, phone lease) must be broken down on the bill so that the customer can see what they are being billed for. (We do not do this now. These charges are bundled together on our bills.)

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A lot of these requirements have been completed. There are however, major changes that will need to be completed. Please let me know when programming will begin as I have to inform our attorneys because of the waiver that we've been granted.

Dave, as we discussed earlier today, I have inserted the telephone number with the CIC codes on the File Maintenance Menu, Option 27. Most of the carriers have called me back with their customer care numbers. If there is a way that this can be tested before we go into billing next Tuesday, I would appreciate it. Please let me know how you make out.

Thanks,
Sherry



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toll free 877-537-6255 local 518-537-6255 fax 518-537-6700
web www.gtowntel.com

FAX SHEETTO: Chris HaylesCOMPANY: OptisFAX NUMBER: 427-1642FROM: SherryDATE: 2/1/00Number of Pages (including cover page): 5**Remarks:**

Chris -
This is the most recent update
on the TIB rules from Illuminet.
Also, I had sent this survey up
to Optis a while ago to see if
you could help us in answering
these questions - maybe some of
these things could help you out
as well.

Thanks for your help

Sherry

**illuminet** SM

TCH B&C Update

A monthly report for all ILLUMINET Billing and Collections customers
January 2000

ILLUMINET Introduces our New, Enhanced Sprint B&C Program

Take a look at the new enhanced offer from ILLUMINET for our Sprint Billing & Collection Program:

In addition to the outstanding service ILLUMINET provides, this new agreement contains several terrific incentives, including:

- **Higher per-message compensation;** enjoy an approximate **40% increase** from the previous Sprint program rate.
- **A \$200 signing bonus,** payable within thirty (30) days following your implementation date - even though you were a previous customer.
- **Up to \$2,000 participation bonus,** based on your message volume and payable 30 days after your first year of resumed participation.

The new agreement is available January 16, 2000 and shall continue in full force and effect through January 15, 2003.

If you have already received executable contracts from ILLUMINET, please sign and send them in right away to take advantage of this enhanced offer. If you have not received executables and are interested in this offering, please contact your ILLUMINET Account Manager.

MCI Toll Adjustments

The ILLUMINET MCI B&C program provides a number of ways for your company to credit your customers, when necessary.

If your customer account recently PIC'd MCI, there could be a short period of time while MCI is setting up the customer account. Because of the timing there is a possibility that the customer may be billed at casual rates.

- You or your customer can fax or mail the bill page reflecting the charges in question to MCI and request a re-rate. Fax to: (800) 366-3122 or mail to: Consumer Relations, MCI Worldcom, P.O. Box 4682, Iowa City, IA 52244-4682. MCI will send a voice message to the customer letting them know when the credit has been approved. MCI will also send LEC/IXC Memo reflecting the adjustment to your company.

After you apply the credit to your customer's account, please report the adjustment on your LEC invoice, be sure to include call detail (bill number, dollar amount credited, CIC, and adjustment reason 411 - re-rate).

OR

- If your company is certain of the rate that the customer should be receiving, your company may re-rate the toll charge and report this adjustment on your LEC invoice. Again, please ensure to include call detail (bill number, dollar amount credited, CIC, and adjustment reason 411 - re-rate).

Just a reminder, MCI has available a CARE Hot Line number, (877) 698-4771 to assist in working through CARE related issues that may be affecting MCI charges to your customer.

As always, if you have questions or concerns, don't hesitate to call ILLUMINET. Your Customer Service Specialist is here to assist you.

✦ Truth-in-Billing Update

The FCC has granted temporary waivers for Truth-in-Billing requirements. ILLUMINET advises readers to refer to FCC Docket No. 98-170 for compliance. The FCC has issued the statement below.

FCC and "Truth in Billing" Deadline Waivers

The FCC has granted temporary waivers of the deadline for compliance with rules adopted in its Truth in Billing and Billing Format proceeding. Small and rural carriers in telecom industry associations had said they needed more time to comply with the new billing requirements.

Eligible carriers now have until April 1, 2000, to include information on their bills regarding how to contact third party service providers such as interexchange carriers, "dial around" (10-10-XXX) long distance carriers, and alternative operator service providers.

The FCC said the waivers applied to all carriers facing difficulties including this contact information on consumer bills, "regardless of whether those carriers have already filed waiver requests or are members of the trade associations that filed the joint petition."

Specifically the FCC granted temporary, limited waivers until April 1, 2000 for compliance with:

- 64.2401 (a)(1) provider identification: 64.2401 (a)(2) separation by provider and 64.2401 (d) billing inquiry contact to the extent that compliance will necessitate software and programming changes.
- 64.2401 (b) description of billed charges to the extent that compliance is affected by Y2K and related computer programming concerns.

The waivers were granted conditioned upon the requirement to provide, until April 1, 2000, billing inserts that describe:

- The FCC's rules that have been waived.
- How a bill departs from the FCC's requirements.
- The actions being taken to accomplish compliance with the FCC's Truth-in-Billing requirements.

Service Programs: How to determine what program your customer is being charged and where to obtain more information

Today, many consumers are ordering service programs from telecommunication companies. Billing for these service programs are sent to your company on 425001 (Customer Charge) or 010118 (Specialized Service/Service Provider Charge) EMI records. To assist your company's inquiry service, ILLUMINET provides both a master list of Service Offerings and Billing Programs (Toll Clearinghouse Master Service Bulletin) and monthly updates (TCH B&C Service Bulletin).

These bulletins provide explanations of the:

- Service programs.
- Record types the service programs will be billed on.
- A number where the consumer should call with questions or cancellations.

Copies of Service Bulletins are available 24-hours-a-day via ILLUMINET's home page at http://www.illuminet.com/docs/tch_docs.shtml. The bulletins will open in Adobe Acrobat Reader. Information about acquiring a free copy of Acrobat Reader for your computer can be found at <http://www.illuminet.com/docs/index.shtml>.



How to determine the program:

Each service program is unique and can be identified using the following information found in the EMI record:

- Carrier identification (position 150-153).
- Sub-CIC (002-B module or if your company does not accept this module: 4250XX records positions 168-171 or 010118 records positions 172-175).
- Charge Phrase (42 record: positions 135-146) and Charge Phrase 2 (42 record: positions 123-134) or Service name (010118 record: positions 135-146).

Using the above information, go to ILLUMINET's Master Service Listing and find the Carrier, the Sub-CIC Number, and the Charge/Text Phrase. This will explain the service program the consumer is being billed. If your company needs help identifying a service program, please contact your Customer Service Specialist for assistance.

Alliance for Telecommunications Industry Solutions/Ordering and Billing Forum (ATIS/OBF)

ILLUMINET is a member of ATIS/OBF and adheres to the ATIS/OBF Industry guidelines. If your company is interested in becoming a member of ATIS/OBF, you can obtain information off the ATIS/OBF Web Site at www.atis.org or by calling the current OBF Manager at (202) 434-8822.

For More Information

If you have questions or need clarification about any of these service announcements, please contact your ILLUMINET Customer Service Specialist:

Tara Neely	tneely@illuminet.com	or	(360) 493-6754
Christi Day	caday@illuminet.com	or	(360) 923-3436
Heather Tackett	htackett@illuminet.com	or	(360) 493-6159
Dale Kennedy	dkennedy@illuminet.com	or	(360) 493-6135
Tim Wood	twood@illuminet.com	or	(360) 493-6162
Derek Nelson	dnelson@illuminet.com	or	(360) 493-6129
Jessica Hancock	jhancock@illuminet.com	or	(360) 493-6143



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web www.growntel.com

FAX SHEETTO: Dave JohnsonCOMPANY: AptisFAX NUMBER: 427-1642FROM: Sherry BarringerDATE: 2/7/00Number of Pages (including cover page): 3**Remarks:**

Updates for TIB Rules-
Please confirm that the fax was
received.
Thanks

KRASKIN, LESSE & COSSON, LLP
ATTORNEYS AT LAW
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS



2120 L Street, N.W., Suite 520
Washington, D.C. 20037

Telephone (202) 296-8890
Telecopier (202) 296-8893

February 4, 2000

Truth-in-Billing Compliance - April 1, 2000 Deadline

As we reported previously, the FCC recently granted limited waiver until April 1, 2000, for similarly-situated carriers unable to comply with certain Truth-in-Billing ("TIB") Rules (listed below) based on the need for computer programming/software changes. The waivers were granted conditioned upon the requirement to provide billing inserts until April 1, 2000. These Rules require that bills:

- ▶ clearly identify the name of the service provider associated with each charge;
- ▶ separate charges by service provider;
- ▶ include with charges a brief, clear, non-misleading, plain language description of the service or services rendered; and
- ▶ contain clear and conspicuous disclosure of any information that the customer may need to make inquiries about, or contest charges, and display a toll-free number or numbers by which customers may inquire or dispute any charge contained on the bill.

The following additional TIB Rules are also scheduled to go into effect April 1, 2000:

- ▶ **"new service providers"** - telephone bills must provide clear and conspicuous notification of any change in service provider, including notification that a new provider has begun providing service. "New service provider" is any provider that did not bill for services on the previous billing statement. The notification should describe the nature of the relationship with the customer, including a description of whether the new service provider is the presubscribed local exchange or interexchange carrier; and
- ▶ **"deniable" and "non-deniable" charges** - where a bill contains charges for basic local service, in addition to other charges, the bill must distinguish between charges for which non-payment will result in disconnection of basic, local service, and charges for which non-payment will not result in such disconnection. The carrier must explain this distinction to the customer, and must clearly and conspicuously identify on the bill those charges for which non-payment will not result in disconnection of basic, local service.

Truth-In-Billing Compliance**Page 2**

Because the April 1 implementation is approaching, we recommend that companies assess their individual TIB compliance. To the extent your company uses outside billing software vendors and/or billing and collection clearinghouses, we recommend that you contact those entities as soon as possible to obtain verification of their ability to provide the software/information to allow you to comply with each of the FCC's TIB Rules by April 1. During this review, if you are concerned that your company may not be able to comply with these requirements by April 1, 2000, and wish to seek waiver and/or extension of time to meet the requirements, please contact us as soon as possible. We highly recommend that any such requests be filed no later than March 15, 2000. These requests should include detailed documentation of the carrier's efforts to comply with the rules.

If you have any questions concerning this matter, please call David Cosson, Thomas J. Moorman, or Margaret Nyland at 202/296-8890.

Subject: RE: Truth-In-Billing

Date: Tue, 15 Feb 2000 12:51:24 -0500

From: LeighAnn Nastasia <leighann.nastasia@aptissoftware.com>

To: "sherryb@valstar.net" <sherryb@valstar.net>

Hi Sherry: Chris is checking into this for you. I will coordinate with him and get back to you as soon as I can.

> -----Original Message-----

> From: Sherry Barringer [SMTP:sherryb@valstar.net]

> Sent: Tuesday, February 15, 2000 9:02 AM

> To: LeighAnn Nastasia

> Subject: Truth-In-Billing

>

> Good Morning,

> We are mid month and I need to know where we are at with the Truth In
> Billing. As I'm sure you are aware, we had several problems with
> billing last month because of the TIB. I do not want to go through
> another billing like that. It is a short month so we are strapped for
> time. The major problem that we had was with the sub cics. I sent
> information to Chris concerning the sub cics that we had received from
> Illuminet. I've sent him a couple emails and have not heard back from
> him. Also, I've just received a tape from Illuminet. I'm going to call
> them today to get a list of the sub cic's off that tape. I think that
> someone there at Aptis will need to modify option 23 off the toll menu
> so that we can get a list of the sub cics when this tape is processed.
> I will make sure that the modem is varied on so that someone can call
> in. Well will need this done right away so that I can get this tape
> processed before billing. Please call me with this or email me which
> ever is easier. I do need to know what's going on. Thanks Sherry

The original email was 2/15/00 to Aptis. Their reply came
three days later, on Feb. 18th.



March 9, 2000

Germantown Telephone Company
Sherry Barringer
Main Street
Germantown, NY 12526

San Antonio Office:
7411 John Smith Drive
Suite 200
San Antonio, TX 78229
P 210.949.7000
F 210.949.7100

Albany Office:
8 Southwoods Blvd
Albany, NY 12211
P 518.431.7500
F 518.427.1642

Glendale Office:
116 North Maryland Ave
Lower Level
Glendale, CA 91206
P 818.543.1881
F 818.543.1411

To all Aptis Clients

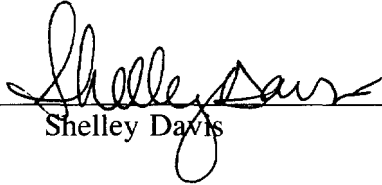
Software development at Aptis is in the process of developing our solution to satisfy the Truth in Billing requirements put out by the FCC. At this time we do not feel that we will be able to deliver that solution to all of our clients in time for the April 1 deadline. Therefore Aptis is strongly urging all of its clients to file for an extension with the FCC by March 15. We will contact you in the near future to go over our interpretation and implementation of the FCC requirements with you. If there are any immediate questions regarding this please feel free to contact me at 518-431-7138.

Sincerely,


Sara Van Dusen
Business Unit Director

CERTIFICATE OF SERVICE

I, Shelley Davis, of Kraskin, Lesse & Cosson, LLP, 2120 L Street, NW, Suite 520, Washington, DC, 20037, hereby certify that a copy of the foregoing "Supplement to March 21, 2000 Petition for Temporary, Limited Waiver" was served on this 22nd day of March, 2000, by hand delivery to the following parties:


Shelley Davis

Lawrence Strickling, Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-C450
Washington, DC 20554

Carol Matthey, Deputy Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW, Room 5B125
Washington, DC 20554

Glenn T. Reynolds, Division Chief
Market Disputes Resolution Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-A847
Washington, DC 20554

Katherine Schroder, Deputy Chief
Accounting Policy Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-C453
Washington, DC 20554

Deena Shetler, Legal Counsel
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-C410
Washington, DC 20554

International Transcription Services
1231 20th Street, NW
Washington, DC 20554